

May 3, 2017

Executive Commissioner Charles Smith  
Texas Health and Human Services Commission  
Brown-Heatly Building  
4900 N Lamar Blvd  
Austin, TX 78751

Dear Executive Commissioner Smith:

On September 1, 2016, programs and services previously administered or delivered by the former Texas Department of Assistive and Rehabilitative Services (DARS) were transferred to the Texas Workforce Commission (TWC) or the Texas Health and Human Services Commission (HHSC). For the first time since the creation of the State Commission for the Blind in 1931, services for individuals who are blind or visually impaired are delivered by multiple state agencies rather than a single state agency providing services for this population through all stages of life and disability. Blind and Visually Impaired Services, the Criss Cole Rehabilitation Center, and the Independent Living Services for Older Individuals Who Are Blind were transferred to TWC. The Blind Children's Vocational Discovery and Development Program and the Blindness Education, Screening, and Treatment Program were transferred to HHSC. Consumers were assured of no interruptions or reductions in service during the transition.

The Policy Council for Children and Families established a workgroup to study changes to the vocational rehabilitation services for students who are blind or visually impaired. The workgroup has initially identified three concerns:

1. *Programs are being eliminated or changing in scope.* DARS Division of Blind Services offered group skills programs for students focusing on social, independent living, and self-advocacy skills. Since September 2016, group skills programs across the state have been cancelled by TWC with little or no justification. The programs are vital to young students with visual impairment. For a young person who is the only student with a visual impairment at the school campus, these programs offer opportunities to interact with other students just like them. These programs also provide opportunities to learn valuable independent living skills. Camp VILLA is a summer camp in West Texas for students ages 8 to 14. Camp VILLA was a program of the West Texas Cluster, comprising employees from DARS Division of Blind Services, Texas School for the Blind and Visually Impaired, Regional Education Service Centers, and Texas Tech University. TWC pulled funding and employees from Camp VILLA, forcing a change in the scope and reduction in services to students attending the camp.
2. *Poor communication on what is considered Pre-Employment Transition Services.* Project SWEEP is a five-week work-based learning experience for high school students who are blind or visually impaired. During the program, the students live on the campus of Texas Tech University and work in the Lubbock community. Contracts for the program were signed by TWC in February 2017, but the internal agency documentation was not approved until the end of April 2017. Regional staff submitted justification documentation multiple times before receiving final approval due to incorrect and inconsistent language in defining Pre-ETS programs which would

fulfill WIOA regulations. Many hours of regional staff members' time would have been saved had those offices been appropriately trained on WIOA regulations and the impact on local programming.

3. *Lack of stakeholder input on transition committee.* Employees with HHSC and TWC have formed a transition committee to evaluate and establish procedures to ensure continuity of service for consumers as they transition from the Blind Children's Program with HHSC to the Vocational Rehabilitation Program with TWC. This committee would benefit from stakeholder input, such as parents and educational partners, as well as formalized guidelines and measurable objectives.

While the information above is specific to the West Texas Cluster, this is a statewide transition issue meriting a statewide response. This is to request that HHSC and TWC:

- include stakeholders on the transition committee established to ensure continuity of services;
- instruct the transition committee to identify service reductions and program eliminations as a result of the transition;
- make recommendations regarding how to mitigate service reductions and program eliminations; and
- report findings to interested advisory committees and the public.

The Policy Council for Children and Families looks forward to working with you to continue studying the transition process for these students to determine if there are additional disabilities, age groups, and areas of concern affected by the transformation process.

Thank you for your commitment to ensuring the seamless transfer of functions that support independence and prevent more costly services later in life.

Very truly yours,

Leah Rummel, Chair  
Policy Council for Children and Families

cc: Larry Temple, Executive Director, Texas Workforce Commission